



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

970314  
EC-2

NOV 20 1997

Ref: 8EPR-EP

Nancy Doelger  
Bureau of Land Management  
Casper District Office  
1701 East E Street  
Casper, Wyoming 82601

Re: Powder River Coal Lease  
Application (WYW136142) and  
Thundercloud Coal Lease Application  
(WYW136548) Draft Environmental  
Impact Statement

Dear Ms. Doelger:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS). We submit the following comments for your consideration in preparation of the final EIS.

The EPA understands the proposed action analyzes the impacts associated with two Lease-By-Application (LBA) tracts, the Powder River LBA and the Thundercloud LBA. Competitive coal lease sales for each tract will result in maintenance leases for successful bidders. The Powder River LBA tract is adjacent to the existing North Antelope and Rochelle Mines and would consist of 4,023.5 lease acres with 515 million tons leased coal (489 million tons recoverable). The Thundercloud LBA tract is adjacent to the existing Jacobs Ranch Mine and would include 3,395.9 lease acres with 427 million tons leased coal (384 million tons recoverable). The DEIS provides an analysis of environmental impacts associated with a combination of dozer, truck-shovel and dragline conventional surface mining action.

The Bureau of Land Management is to be commended for a well organized and informative document. Discussion on pp. 4.6 through 4.9 of water resources impacts is very informative. In particular, cumulative impacts discussion, on p. 4.34 through 4.44, related to water resources is quite thorough.

In general, Air Quality discussion in Chapter 3, Affected Environment presents a full disclosure of existing activities. This discussion combined with the Air Quality impact disclosure



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section in Chapter 4 provide sufficient information related to anticipated additional impacts. We do recommend that a wind rose representative of the assessment area be included in Section 3.5. This information would also be helpful for the PM 10 impact disclosure in Section 4.5.4. It would also be helpful if a figure showing the location of Air Quality Monitoring sites referenced in Table 3.5 were included in that section.

In Section 4.7 Irreversible and Irretrievable Commitment of Resources, it is noted that "Coal bed methane associated with this coal would also be lost." In light of the present coal bed methane production elsewhere in the Powder River Basin as well as anticipated increased interest, is it possible to estimate the volume of this resource that would be lost if it were not produced prior to strip mining operations? A brief discussion of this lost resource and an assessment of its significance would be helpful.

Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the EPA Region VIII rates this DEIS as EC-2. This means that we have identified additional information needs, as noted, that would assist us in fully assessing environmental impacts related to the project. A summary of our rating criteria is attached.

We appreciate the opportunity to review and comment on the DEIS. Should you have any questions, please contact Mike Hammer of my staff at (303) 312-6563.

Sincerely,



Carol L. Campbell, Director  
Ecosystems Protection Program

cc: Elaine Suriano, OFA EPA-HQ